

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
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**FINANCIAL GUARANTY INSURANCE  
COMPANY'S LIST OF WITNESSES IN ADVANCE OF TRIAL  
ON THE PROPOSED CONFIRMATION OF THE DEBTOR'S PLAN**

Financial Guaranty Insurance Company ("FGIC") hereby identifies the following individuals, exclusive of those to be offered for rebuttal purposes, as witnesses that FGIC expects to call at any evidentiary hearing on the City of Detroit's (the "City's") proposed plan for the adjustment of debts (the "Plan") and the subjects that each witness will address:

No.	Name, Title, Description of Testimony
1.	Stephen Spencer, Managing Director for Houlihan Lokey. Mr. Spencer will testify as an expert witness in this matter, and, as a fact witness, on his involvement in the process of obtaining indications of interest of the art collection housed at the DIA.
2.	Victor Weiner, an appraiser and Director of Victor Wiener Associates, LLC. Mr. Weiner will testify as an expert witness in this matter, and, as a result, on his involvement in issuing an opinion regarding the value of art collection housed at DIA.

1. FGIC reserves the right to amend or supplement the list of witnesses and further reserves the right to amend or supplement the testimony topics described herein as may be necessary, including to address any modifications or refinements to the Plan or objections thereto or to address any new issues identified.

2. Pursuant to that certain Stipulation By and Between the City of Detroit, Michigan and the COPs Creditors Regarding Certain Facts and the Admission of Certain Exhibits for the Confirmation Trial, dated July 13, 2014 [Docket No. 5984], FGIC agreed that it will not call upon Derek Donnelly, Seth Lehman, Irvin Corley, Jr., Sean Werdlow, Roger Short, and John Williams to testify at any evidentiary hearing on the Plan. On that basis, these individuals are not included on FGIC's witness list.

3. FGIC reserves the right to call as a witness any fact witness designated by the Debtor, any adverse party, and/or any party objecting to or supporting the Plan.

4. FGIC continues to evaluate the authenticity and admissibility of certain exhibits which would otherwise require the appearance in court of a custodial witness. FGIC reserves the right to call such witnesses if appropriate stipulations and agreements are not reached.

5. In accordance with the deadlines set by this Court, FGIC reserves the right to submit deposition designations and offer counter-designations in response to deposition designations offered by any adverse party, and for that reason this witness list does not include those witnesses that FGIC intends to offer testimony from through the designation of deposition testimony. FGIC reserves the right to offer testimony at trial from such witnesses through the designation of deposition testimony.

6. FGIC further reserves its right to call any witness and designate the deposition testimony of any witness previously listed on an adverse party's witness lists, if such witness is subsequently dropped from a witness list or otherwise not called to testify at trial.

DATED: August 14, 2014  
Houston, Texas

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Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 14, 2014, *Financial Guaranty Insurance Company's List of Witnesses in Advance of Trial on the Proposed Confirmation of the Debtor's Plan* was filed and served via the Court's electronic case filing and noticing system to all registered users that have appeared in this Chapter 9 proceeding.

Dated: August 14, 2014

/s/ Alfredo R. Pérez

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